

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP PLC

ATTORNEYS AT LAW

MEMPHIS DOWNTOWN
One Commerce Square, Suite 2000
Memphis, Tennessee 38103
Telephone 901-259-7100
Facsimile 901-259-7150

HISTORIC CASTNER-KNOTT BUILDING
618 CHURCH STREET, SUITE 300
NASHVILLE, TN 37219

(615) 726-1200 telephone
(615) 726-1776 facsimile

MEMPHIS EAST
1100 Ridgeway Loop Road, Suite 400
Memphis, Tennessee 38120
Telephone 901-259-7120
Facsimile 901-259-7180

Charles B. Welch, Jr.
cwelch@farrismathews.com

Reply to
Nashville Office

July 1, 2004

RECEIVED

JUL 01 2004

Chairman Deborah Taylor Tate
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

TN REGULATORY AUTHORITY
GENERAL COUNSEL'S OFFICE

RE: Motion to Consolidate IRM Utility, Inc.'s Petitions to amend Certificate of Convenience and Necessity – Docket No. 04-00101, Docket No. 04-00152, Docket No. 04-00153

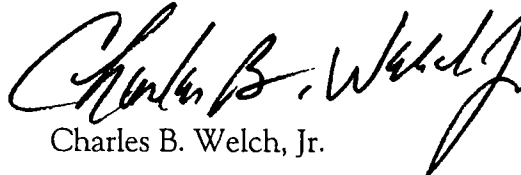
Dear Chairman Tate:

Please find enclosed an original and 17 copies of the above referenced motion. IRM Utility, Inc. has filed a motion to consolidate the referenced Dockets and submits this filing in anticipation of consolidation in an effort to avoid a multiple, voluminous filings. Please date and stamp a copy for our records.

Thank you for your assistance regarding this matter. If you have any questions, or if I may be of further assistance, please do not hesitate to contact me.

Very truly yours,

FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC



Charles B. Welch, Jr.

CBW/ale

**TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

| | | |
|--------------------------------------|---|----------------------------|
| IN RE: |) | |
| |) | |
| MOTION TO CONSOLIDATE |) | |
| |) | |
| PETITION OF IRM UTILITY, INC |) | |
| TO AMEND ITS CERTIFICATE |) | Docket No. 04-00101 |
| OF CONVIENCE AND NECESSITY |) | |
| |) | |
| and |) | |
| |) | |
| PETITION OF IRM UTILITY, INC |) | |
| TO AMEND ITS CERTIFICATE OF |) | Docket No. 04-00152 |
| CONVIENCE AND NECESSITY |) | |
| |) | |
| and |) | |
| |) | |
| PETITION OF IRM UTILITY, INC. |) | |
| TO AMEND ITS CERTIFICATE OF |) | Docket No. 04-00153 |
| CONVIENCE AND NECESSITY |) | |

MOTION FOR CONSOLIDATION

IRM Utility, Inc. ("IRM") by and through undersigned counsel, petitions the Tennessee Regulatory Authority to consolidate the following petitions to amend its Certificate of Convenience and Necessity. In support of its motion, IRM states as follows:

1. The Dockets subject to consolidation are:

(A) Docket No. 04-00101 – Petition to expand its service area to include a portion of Roane County, Tennessee known as Emory Point;

(B) Docket No. 04-00152 – Petition to expand its service area to include a portion of Knox County, Tennessee known as Lot 23 – The River Club subdivision; and

(C) Docket No. 04-00153 – Petition to expand its service area to include a portion of Jefferson County, Tennessee known as Wild Pear Shores subdivision

2. This issue of IRM's capability to serve the proposed service area and the public interest are the threshold issues in each of the pending dockets

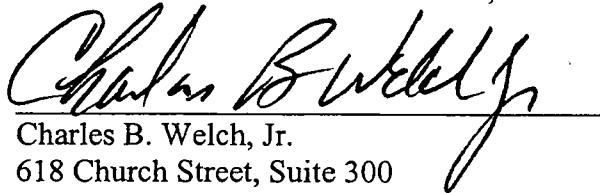
3. Consolidation of these dockets will avoid unnecessary, duplicate filings of identical documents.

4. In the interest of judicial economy, consolidation will avoid multiple hearings and repetitive staff review of similar, if not identical issues, and, therefore, is more time and cost efficient.

WHEREFORE, PREMISES CONSIDERED, IRM prays that is be granted the consolidation.

DATED this 1st day of July, 2004.

Respectfully submitted,
FARRIS MATHEWS BRANAN
BOBANGO HELLEN & DUNLAP, PLC



Charles B. Welch, Jr.
618 Church Street, Suite 300
Nashville, TN 37219
(615) 726-1200

CBW/ale